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June 17, 2005

VIA ECF

Hon. Alexander Williams, Jr.
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, MD 21201

Re: Jeff Schmidt v. American Institute of Physics
Case No.: 8:04-cv-3774 (AW)

Dear Judge Williams:

We represent Defendant in the above referenced matter. The parties jointly write to request an extension of the discovery schedule in this action from June 27, 2005 to November 1, 2005. Approximately one month ago, the parties retained the services of Harold Himmelman, a JAMS mediator. The parties have scheduled a mediation for July 19 and 20, 2005. The parties are serious about trying to resolve Plaintiff's claims and are dedicating significant time to assisting Mr. Himmelman in preparing for the mediation. We are hopeful that mediation will allow the parties to resolve Plaintiff's claims.

Prior to retaining Mr. Himmelman, the parties exchanged written discovery and were trying to resolve discovery disputes without the need for the Court's intervention. If mediation is unsuccessful, we anticipate needing 90 days to complete discovery (i.e., August 1 to November 1). We believe that the 90 days is necessary given the number of depositions expected. Defendant anticipates that it will need to depose Plaintiff and approximately 4 other witnesses, including Plaintiff's expert. Plaintiff anticipates deposing approximately 5 witnesses. Thank you.

Respectfully submitted,

JACKSON LEWIS LLP

Wendy J. Mellk/seg
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WJM/kh

cc: Erik Koons, Esq.
Warren Kaplan, Esq.